

# Due Diligence Report

## Introduction

The core values in the Transparency Act are a natural part of our business, both internally and externally. The legislation requires us to document how we, as a company, promote these values with the associated value chain and obliges us to carry out due diligence assessments in accordance with the OECS guidelines.

The Norwegian Transparency Act came into force on 1 July 2022, and we at Hatteland Technology are undividedly positive about legislation that promotes respect for fundamental human rights and decent working conditions.

## Who are we?

Hatteland Technology is a global technology partner for system integrators in a wide range of industries. We provide tailored solutions comprising monitors, panel computers, industrial automation, network hardware, CCTV, and software. Hatteland Technology AS' history dates back over 35 years, and is today 100% owned by Embron Group AS.

Our main markets are Marine & Offshore, Transportation, Industrial Automation, Naval & Defense and High Security and Retail.

We have more than 240 employees (as of 2025) in 8 countries and partners in many other countries worldwide. Hatteland Technology's main office is located in Akksdal, Norway. We also have production facilities in Lysaker (Oslo area, Norway) and Sollentuna (Stockholm area, Sweden). Additionally, we have sales and R&D/Purchasing offices in Finland, Germany, France, the US, and Taiwan.

The company's management team is based in Norway and Sweden and consists of twelve people: five women and seven men of different ages and areas of responsibility. Diversity, respect, and inclusion are integrated into our work ethics and anchored in our business guidelines and leadership principles.

Read more here. <https://www.hattelandtechnology.com/about>

## How we work to ensure commitment

Hatteland Technology works purposefully to balance economic, environmental, and social considerations. Our well-founded ethical values shape how we behave and work together, laying the foundation for our internal operations and what external business partners can expect from us. Our responsibilities in security, environment, ethics, and anti-corruption are well established throughout the company, including management and the board.

## Human rights

Partners and suppliers are expected to share Hatteland Technology's commitment to Human Rights and particularly to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labor Organization (ILO) Conventions.

## Environment, Health and Safety

Partners and suppliers shall establish an appropriate management system for Environment, Health, and Safety (i.e. ISO 14001) and promote the awareness of those policies among workers and suppliers.

## Employment practices

Partners and suppliers are expected to ensure that their employees are provided with a workplace environment free from physical, psychological, and verbal harassment or other abusive conduct. Furthermore, partners and suppliers must provide employees with a safe and healthy working environment.

## Anti-corruption

Partners and suppliers are required to implement governance rules within their organizations to comply with applicable laws and regulations. They are also expected to regularly provide adequate training to their employees and executives, particularly those in the most exposed positions.

## Due Diligence Process

Hatteland Technology's management system includes structured internal and external risk assessments to identify and mitigate risks related to human rights, working conditions, health and safety, environmental impact, and business ethics.

Our due diligence process is based on the OECD Guidelines for Multinational Enterprises and is aligned with the requirements of the Norwegian Transparency Act. Risk assessments are performed at different levels of the organization and across our supply chain. We conduct annual reviews of our critical suppliers, with new suppliers added to the process as needed.

To assess environmental, social, and governance (ESG) risks, we will start using the IntegrityNext platform. This system allows us to continuously monitor and evaluate our suppliers based on key ESG indicators, including human rights, labour practices, environmental performance, and anti-corruption. Suppliers are asked to share relevant documentation and confirm compliance through the platform.

In addition, we monitor our supply chain through trend analysis, internal KPIs, and ongoing supplier collaboration. If actual or potential adverse impacts are identified, we initiate corrective measures such as audits, targeted information gathering, or follow-up actions tailored to the severity of the issue.

## The Norwegian Transparency Act

The Norwegian Transparency Act, in force since 1 July 2022, aims to ensure companies respect fundamental human rights and decent working conditions throughout their supply chains and business relationships.

Hatteland Technology fully supports the objectives of the Act. We have implemented a due diligence framework based on OECD guidance to identify, assess, and respond to potential human rights and ESG risks in our supply chain.

We are committed to transparency, traceability, and responsible business conduct. Our supplier assessments, supported by the IntegrityNext platform, provide insight into ethical and environmental practices and allow us to follow up on areas of concern. We are also committed to disclosing relevant information to stakeholders upon request, in accordance with the law.

Transparency is not only a regulatory requirement but also a reflection of our core values and commitment to sustainable and ethical business practices.

Our suppliers are distributed within the following geographical areas.



Map visualizing Hatteland Technology's TOP20+ suppliers geographically by 2023

## Negative Consequences and Significant Risk

Hatteland Technology has conducted a risk assessment of its top 70 suppliers to identify potential human rights violations within its supply chain. This review includes evaluating factors such as geographical location, industry sector, supplier type, and known risks associated with specific countries or regions. Identified risks are categorized based on severity, likelihood, and potential impact on human rights, enabling prioritization of mitigation efforts. Given our average business relationship with these suppliers of 12 years and their compliance with the requirements outlined in Hatteland Technology's Sustainability and Corporate Social Responsibility guidelines, the risk level identified is low.

A double materiality analysis has been performed according to the requirements from the Corporate Social Responsibility Directive (CSRD) and a risk assessment has been conducted for

the lifecycle of our products. Identified actions and improvement will be handled throughout our internal integrated improvement routines and quality control processes.

## Action Plan

Processes and procedures have been implemented in our organization to align with the intentions of the Transparency Act. Hatteland Technology schedules periodic audits and assessments to verify suppliers' compliance with responsible business practices, including human rights. To prevent or mitigate any negative consequences, we will closely monitor developments in countries associated with higher risk and take appropriate actions as necessary.

## Conclusion and Declaration

Through our due diligence assessment, we have concluded that our implemented processes and procedures are sufficient. According to our investigation and review of relevant documents and practices, we have not found any indications or documented cases of violations of the Transparency Act. We recognize that continuous and structured efforts from several departments are required to achieve the desired outcomes.

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